A-2
6/24/97

FAX TRANSMITTAL 5 Pages

TO: Darryl Owens

COMMENTS: Attached are my comments on Reilly Tar PCOR. When the PCOR is signed, please fax me a copy, and I'll forward it to Rafael Gonzalez who keeps the official list of Construction Completions.

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PRELIMINARY CLOSE OUT REPORT
REILLY TAR AND CHEMICAL CORPORATION SITE
ST. LOUIS PARK, MINNESOTA

INTRODUCTION

This Preliminary Close Out Report (PCOR) documents that the U. S. Environmental Protection Agency (EPA) completed construction activities at the Reilly Tar and Chemical Corporation Site (Site) in accordance with Procedures for Completion and Deletion of National Priorities List Sites and Update (OSWER directive 9320.2-3C). The Minnesota Pollution Control Agency (MPCA) conducted a final inspection on June 12, 1997, and determined that the construction of the remedy for Operable Unit 5 (the last remaining operable unit) had been constructed in accordance with the remedial design plans and specifications, and no further response is anticipated. EPA and the MPCA have initiated the activities necessary to achieve performance standards and site completion.

SUMMARY OF SITE CONDITIONS

INCLUDE NPL LISTING INFORMATION (DATES PROPOSED + FINAL)

Between 1917 and 1972, Reilly Industries operated a coal tar distillation and wood preserving plant, known as the Republic Creosoting Company on an 80 acre site in St. Louis Park, Minnesota. The bulk of the plant's operations took place in the south-central and southeastern portions of the Site. These areas contained the coal tar distillation still, wood-treating building, and the aboveground and underground storage tanks (for creosote, tars, pitch and fuel oils).

Spills of products and discharges of wastes to the ground and to ditches on the site resulted in contamination of the ground water with polynuclear aromatic hydrocarbons (PAHs) and phenols. Contamination was detected in public water supplies by 1974. Since the early 1980s, the Site has been investigated in detail by state and federal health and environmental agencies. Concentrations of PAHs as high as 1000 micrograms per liter (ug/l) have been found in surficial aquifers. In addition, PAH concentrations of approximately 10 ug/l have been found in the aquifer from which area municipalities draw drinking water. Drinking water contamination has been resolved by treating the contaminated water, but substantial ground water contamination remains.

In 1986, the former owners of the Site, along with the City of St. Louis Park (City) signed a Consent Decree (CD) with the EPA and the MPCA. Under this agreement, the parties responsible for the Site were to implement remedial actions in known areas of contamination and continue investigating the extent of the contamination in other areas and conduct necessary cleanup actions. The full range of site-related activities that address the remaining contamination issues is specified in the CD and Remedial Action Plan (CD/RAP).

REMEDIAL CONSTRUCTION ACTIVITIES

The Reilly Tar and Chemical site has 5 Operable Units (OU). Records of Decisions (ROD) have been issued for each of these OUs from 1984 through 1995. Some of the earliest remedial actions

at the site have been operational for almost 10 years. The following is a brief summary of remedial construction activities for each of the OUs:

Operable Unit 1

A ROD was issued on June 6, 1984 for OU 1 and consisted of a granular activated carbon (GAC) treatment plant to treat contaminated groundwater at two municipal wells. Construction was initiated on December 27, 1985 by Calgon Corporation, under contract to Reilly Tar. After a period of testing and adjustment to eliminate potential backflow problems, the GAC plant began full operation on July 9, 1986. The system consists of two columns filled with powdered carbon which filters out the contaminants in the groundwater. A report is submitted annually to the Agencies delineating the effectiveness of the GAC treatment plant.

Drinking Water Criteria were developed at the site to determine cleanup goals, since there were no Maximum Contaminant Levels (MCLS) developed for PAHs at the time. These Drinking Water Criteria, shown in Table 1 below, are also used as the performance standards for the GAC treatment plant.

TABLE 1
Drinking Water Criteria

Sum of Benzo(a) pyrene and Dibenzo(a,h) anthracene	5.6 ng/l*
Carcinogenic PAHs	28.0 ng/l
Other PAHs	280.0 ng/l

* ng/l is equivalent to parts per trillion

Operable Unit 2

On May 30, 1986 an Enforcement Decision Document was issued for the following remedy:

- Source control and groundwater gradient control pumping wells in 5 aquifers underlying the site.
- Groundwater gradient control through pumping of a municipal well. Water from the municipal well will be treated in a GAC treatment plant and than reintroduced into the water supply system.
- Capping and filling of hazardous wastes in a wetland/bog adjacent to the site.
- Filing of deed restrictions for current and future land use in the areas of contamination.

The four source control wells and one gradient control well were installed by Reilly Tar in 1986 and 1987. Wells were constructed of stainless steel casing and located in pumphouses approximately 7 feet square with sufficient area to perform maintenance work. The pumphouse

roofs have removable panels to allow for access to the well by a drill rig or crane. The wells have been in operation for approximately 10 years and will continue pumping until the drinking water criteria have been met. BY WHOM ?

The GAC plant for treatment of the groundwater gradient control discharge from the municipal well was constructed by the City of St. Louis Park during 1992 and 1993. The GAC plant was constructed in accordance with plans and specifications with no major changes. The City had signed an agreement with Reilly Tar to manage construction of this remedial action and the other remaining site remedial actions. end of OM?

IS THIS THE CAP? DOES THIS REQUIRE ANY MAINTENANCE? IF SO, WHO DOES IT?

Areas of surficial contamination in the wetland/bog adjacent to the site were covered with 1 foot of clean fill. The filling activities were completed in 1987 and were inspected by the U. S. Fish and Wildlife Service (FWS) to ensure that the filling was properly performed. The FWS and the Corps of Engineers reviewed the permit for filling of the wetland/bog and determined the wetland loss was not significant and therefore, no mitigation for loss of wetland area was required.

→ INSTITUTIONAL CONTROLS/DEED RESTRICTIONS : DESCRIBE

Operable Units 3, 4 and 5

At the time the EDD was issued for OU2 it was determined that additional remedial investigation/feasibility study (RI/FS) work would be required for 3 of the aquifers at the site. This resulted in the issuance of additional RODs for OUs 3, 4, and 5. A similar remedy of gradient control was chosen in the ROD for each operable unit.

The ROD for OU 4 was issued in September 1990 and consisted of a gradient control well. The City began operation of the well in 1991. The ROD for OU 3 was issued in September 1992 and also consisted of a remedy of a gradient control well. This gradient control well was constructed by the City and completed in December 1994. A final inspection was performed of this well in January 1995.

The ROD for OU 5 was issued in June 1995 and also consisted of a gradient control well. The City constructed the gradient control well in July 1996. However, during the installation of the well, observation of the soil and bedrock conditions indicated that the well might not yield sufficient water. Subsequent pumping tests confirmed that the well would not provide sufficient drawdown to establish a significant capture zone. Since this location was considered the best potential location for gradient control within this area of concern of the aquifer, a gradient control well could not be constructed within the area of concern. However, an Explanation of Significant Differences was issued in March of 1997 to use a well immediately downgradient of the study area for gradient control. This well was constructed by the City in the fall of 1996 and completed in June 1997. An inspection was conducted on June 12, 1997 and it was determined that the well had been constructed in accordance with the approved design and was fully operational. The inspection also determined that no punch list items were left to perform and thus this inspection is considered to be the final inspection.

DEMONSTRATION OF CLEANUP ACTIVITY QUALITY ASSURANCE AND QUALITY CONTROL

Activities at the site were consistent with the RODs written for each of the operable units, with the CD/RAP, with the FSD, and with the work plans for the various activities. The various remedial design reports incorporated all EPA and State quality assurance and quality control (QA/QC) procedures and protocol. EPA analytical methods or special low level detection procedures required by the CD/RAP were used for all monitoring samples during remedial activities and operations and maintenance. All procedures and protocol followed for soil and water sample analysis during the remedial activities were documented in remedial design reports or other documentation approved by the Agencies and were conducted in accordance with the Quality Assurance Project Plan (QAPP) approved by EPA.

The QA/QC program used throughout the RA was rigorous and in conformance with EPA and state standards; therefore, EPA and the State determined that all analytical results are accurate to the degree needed to assure satisfactory execution of the RA, and consistent with the ROD and RD plans and specifications.

INDICATE RESPONSIBLE ORGANIZATIONS

ACTIVITIES AND SCHEDULE FOR SITE COMPLETION

The remedial activities that remain include continued operation and maintenance of the pumping systems, continued ground water monitoring, maintenance of institutional controls, completion of groundwater pump and treat, preparation of final close out report and NPL deletion . Activities will be completed according to the following schedule:

Task	Estimated Completion	Responsible Organization
Completion of Groundwater Pump & Treat	01/01/25	EPA/State
Final Closeout Report	06/30/25	EPA/State
NPL Deletion	06/30/26	EPA/State

FIVE-YEAR REVIEW

Hazardous substances will remain at the site above health-based levels after the completion of the remedial action. Pursuant to CERCLA section 121(c) and as provided in OSWER Directive 9355.7-02, *Structure and Components of Five Year Reviews*, May 23, 1991, and OSWER Directive 9355.702A, *Supplemental Five Year Review Guidance*, July 26, 1994, EPA must

conduct a statutory five year review. A five-year review was completed for all operable units on March 28, 1996. Another five-year review will be completed in March 2001 .

APPROVED BY:

_____ Date

William E. Muno, Director
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